

App. No. 09/927,096
Amendment Dated: December 1, 2006
Reply to final Office Action of September 1, 2006

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REMARKS/ARGUMENTS

Claims 1-5 and 7-36 remain in this application for further review. The claims have been amended for clarity as set forth above. No new matter has been added.

I. Rejection of the Claims Under 35 U.S.C. 103(a)

Claims 1-3, 6, 7-10, 13-16, 18-20, 21-22, 24-28, 29, and 32-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Publication No. 2002/0026443 published to Chang et al. (hereinafter "Chang") in view of U.S. Patent No. 6,327,590 issued to Chidlovskii et al. (hereinafter "Chidlovskii"), and further in view of U.S. Patent No. 6,732,088 issued to Glance (hereinafter "Glance"). Claims 4-5, 11-12, 17, 23 and 30 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chang in view of Chidlovskii and further in view of Blackwell. Applicants respectfully disagree with the rejections. Independent claim 1 includes the following combination of features not taught or otherwise suggested by the cited references:

"a search engine manager configured to receive a search query from a client and to translate the search query to a standard query, wherein the standard query is universally formatted for a plurality of search engine wrappers registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engine wrappers registered with the search engine manager; and

each of the search engine wrappers being configured to translate the standard query to a native format query of a registered search engine associated with the search engine wrapper, wherein each of the search engine wrappers translates the standard query into a different native format, and to communicate the native format query to the registered search engine, the search engine wrapper being further configured to return results from the registered search engine to the search engine manager."

Claim 1 recites a search engine manager that translates the search query to a standard query. The standard query is sent to a plurality of search engine wrappers. Each of the search engine wrappers translates the standard query into a native format. Each of the native formats is different from one another depending on the search engine that is associated with the particular wrapper. In this manner, a search query can be used to query a plurality of different search engines and receive results.

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This combination of features is not taught in the cited references. With regard to Chang, the Office Action asserts that Chang teaches “a search engine manager configured to receive a search query from a client and to translate the search query to a standard query, and to *communicate the standard query* from the search engine manager to a search engine wrapper.” *Office Action*, at pg. 3 (emphasis added). However, when FIGURE 10 of Chang is read in light of the specification, it is clear that Chang does not teach the asserted features. Chang teaches that the “canonical form 44 is the input for the federated query processor module 46.” *Chang*, at para. [0454] (emphasis added). The module translates the query canonical form into several *native queries 47 that corresponds to each native datastore 48.*” *Chang*, at para. [0455] (emphasis added). Chang continues by teaching that the federated query processor module 46 converts data in the query *into a native data type for each of the associated native datastores 48.*” *Chang*, at para. [0456] (emphasis added). Conversely, claim 1 recites a “*search engine manager* configured to receive a search query from a client and to *translate the search query to a standard query.*” Accordingly, in claim 1, the search engine manager is translating the search query into a standard query so that each of the wrappers can understand the query. In Chang, the federated query processor module to converting the canonical form into a plurality of native queries for a plurality of data stores. Chang teaches away from the features of claim 1.

Moreover, independent claim 1 has been amended to further clarify the distinguishing features of claim 1. These clarifying features are also not taught in claim 1. Claim 1 has been amended to recite a plurality of search engine wrappers and that each of the search engine wrappers receives the standard query from the search engine manager. Each search engine wrapper translates the standard query into a different native format. Chang does not teach these features. Chang teaches data stores not search engines. Chang also fails to teach search engine wrappers. Chang further fails to teach search engine wrappers that receive a standard query. Again, Chang teaches that the federated query processor converts the query conical form into a plurality of native formats. This type of conversion is contrary to the features of claim 1.

The Office Actions reliance on Chidlovskii does not remedy the lack of teaching in Chang. Chidlovskii teaches a metadata search engine for ranking documents. Yet, applicants can find no teaching in Chidlovskii of a *search engine manager* configured to receive a search

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query from a client and to *translate the search query to a standard query*, wherein the standard query is universally formatted for a *plurality of search engine wrappers* registered with the search engine manager." Also, applicants can find no teaching in Chidlovskii that "*each of the search engine wrappers* being configured to translate the standard query *to a native format query* of a registered search engine associated with the search engine wrapper, *wherein each of the search engine wrappers translates the standard query into a different native format.*"

The Office Action reliance on Glance does not remedy the lack of teaching in Chidlovskii and Chang. Glance teaches that "[t]he 'wrappers' take a query and present it to the search engine in a format and protocol accepted by the search engine." Here, Glance does teach a wrapper. However Glance fails to teach "a *search engine manager* configured to receive a search query from a client and to *translate the search query to a standard query*, wherein the standard query is universally formatted for a *plurality of search engine wrappers* registered with the search engine manager." Also, Glance fails to teach a plurality of search engine wrappers and that *each of the search engine wrappers translates the standard query into a different native format.*" Accordingly, applicants assert that the proposed combination in the Office Action fails to teach all the limitations of claim 1.

Furthermore, the proposed combination of Chang and Glance would render Chang non-functional. Chang teaches that the "canonical form 44 is the input for the federated query processor module 46." *Chang*, at para. [0454] The module translates the query canonical form into several *native queries 47 that corresponds to each native datastore 48.*" *Chang*, at para. [0455] (emphasis added). Chang continues by teaching that the federated query processor module 46 converts data in the query *into a native data type for each of the associated native datastores 48.*" If the wrapper of Glance was combined with the federated query processor module of Chang, the search query that would result could not be comprehended by the system. Chang teaches that the federate query processor translates the query canonical form into several native queries. These native queries are what is understandable by the data stores of Chang. If the wrapper was inserted after the federated query processor, another translation would occur. Accordingly, Glance's wrapper would either be duplicative and need to do nothing to the query, or Glance's wrapper does something to the query and renders the query meaningless to the data

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store. Either way, Glance's wrapper is damaging to the operation of Chang's federated query processor module. In the manner recited hereinabove, applicants assert that claim 1 is allowable over the proposed combination of references.

Independent claim 7 includes the following combination of features not taught or otherwise suggested by the cited references:

receiving a search query, *at a search engine manager*, having a plurality of search parameters, the search query being generated by a search client;

building a standard query from the search query, wherein the standard query is universally configured to be *understandable by a plurality of search engine wrappers*;

issuing the standard query to *each of the plurality of search engine wrappers*;

receiving the standard query *at each of the plurality of search engine wrappers*;

at each of the plurality of search engine wrappers, *translating the standard query to a native format query for a search engine associated with the search engine wrapper, wherein the native format query is unique to the search engine associated with the search engine wrapper*; and

issuing, from each of the search engine wrappers, the unique native format query to the search engine associated with the search engine wrapper.

As set forth above, applicants assert that the references may not be combined in the manner propounded. Moreover, the references do not teach a search engine manager that builds a standard query from a search query. The references also do not teach the plurality of wrappers as recited. As previously stated, Chang teaches issuing several queries in native format. The other references do not remedy the lack of teaching. Accordingly, applicants assert that claim 7 is allowable over the cited references.

Independent claim 13 includes the following combination of features not taught or otherwise suggested by the cited references:

"building a standard query from the client query received from the client, wherein the standard query is universally formatted for wrappers;

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passing the standard query from the search engine manager to a plurality of wrappers, wherein each of the plurality of wrappers is associated with a different registered search engine;

translating, at each of the wrappers, the standard query to a translated query in a native format of the registered search engine associated with the wrapper, wherein each of the wrappers translates the standard query into a different native format;

transmitting the translated query to the registered search engine; and

receiving results of the translated query from the registered search engine."

As set forth above, applicants assert that the references may not be combined in the manner propounded. Moreover, the references do not teach a search engine manger that builds a standard query from a search query. The references also do not teach the plurality of wrappers as recited. As previously stated, Chang teaches issuing several queries in native format. The other references do not remedy the lack of teaching. Accordingly, applicants assert that claim 13 is allowable over the cited references.

Independent claim 21 includes the following combination of features not taught or otherwise suggested by the cited references:

"discovering at least one search engine registered with a search system;

receiving a query initiated by a client accessing the search system;

building a standard query from the query initiated by the client, wherein the standard query is universally configured to be understandable by a plurality of engine wrappers;

transmitting the standard query to a plurality of search engine wrappers, wherein each search engine wrapper is configured to translate the search query into a native format that is unique to a search engine registered with the search engine wrapper;

requesting a response from each of the search engine wrappers the response including a progress update for the standard query as it is executed and the results of the standard query; and

receiving responses from each of the search engine wrappers."

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As set forth above, applicants assert that the references may not be combined in the manner propounded. Moreover, the references do not teach building a standard query from a search query. The references also do not teach the plurality of wrappers as recited. As previously stated, Chang teaches issuing several queries in native format. The other references do not remedy the lack of teaching. Accordingly, applicants assert that claim 21 is allowable over the cited references.

Independent claim 29 includes the following combination of features not taught or otherwise suggested by the cited references:

receiving *a standard query from a search engine manager*, wherein the standard query is universally configured to be understandable by a plurality of engine wrappers;

translating the standard query, at a search engine wrapper, into a native format query, wherein the native format query is specific to a search engine associated with the search engine wrapper;

transmitting the native format query associated with the at least one search engine to the at least one search engine;

transmitting a progress update to the search engine manager for the standard query as it is executed;

receiving results from the at least one search engine; and

transmitting the results received from the at least one search engine to the search engine manager.

As set forth above, applicants assert that the references may not be combined in the manner propounded. Moreover, the references do not teach building a standard query from a search query. The references also do not teach the plurality of wrappers as recited. As previously stated, Chang teaches issuing several queries in native format. The other references do not remedy the lack of teaching. Accordingly, applicants assert that claim 29 is allowable over the cited references.

With regard to the dependent claims, the dependent claims include features not taught or suggested by the cited references. Moreover, those claims ultimately depend from the

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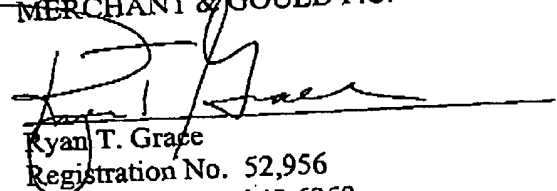
independent claims. As such, that are thought allowable for at least the same reasons set forth above.

II. Request for Reconsideration

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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